



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 2008

Elizabeth Kingsley, Esquire
Harmon, Curran, Spielberg & Eisenberg
1726 M Street, N.W.
Suite 600
Washington, D.C. 20036

RE: MUR 5970
Citizens Services, Inc.

Dear Ms. Kingsley:

On February 7, 2008, the Federal Election Commission notified your client, Citizens Services, Inc. ("CSI"), of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). On October 22, 2008, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe CSI violated the Act. Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files*, 68 Fed. Reg. 70,426 (Dec. 18, 2003). The Factual and Legal Analysis, which explains the Commission's findings, is enclosed for your information.

If you have any questions, please contact Elena Paoli, the attorney assigned to this matter at (202) 694-1548.

Sincerely,

A handwritten signature in black ink that reads "Julie K. McConnell/ejp".

Julie K. McConnell
Assistant General Counsel

Enclosure
Factual and Legal Analysis

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2 **FEDERAL ELECTION COMMISSION**

3 **FACTUAL AND LEGAL ANALYSIS**
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5 **RESPONDENT:** **Citizens Services, Inc.**

MUR: 5970

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8 **I. INTRODUCTION**

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10 This matter was generated by a complaint filed with the Federal Election Commission by
11 **Lori Sherwood. See 2 U.S.C. § 437g(a)(1).**

12 **II. FACTUAL AND LEGAL ANALYSIS**

13 The complaint states that Donna Edwards for Congress ("Committee") paid \$76,866 to
14 **Citizens Services, Inc. ("CSI") for get-out-the-vote activities. The complaint alleges that CSI, a**
15 **nonprofit organization, received money in a coordinated effort with the Committee and engaged**
16 **in political activity.**

17 CSI is a Louisiana nonprofit corporation that provides consulting and field services to a
18 **number of different clients. CSI states that it is a vendor and had a contract with the Edwards**
19 **Committee to perform get-out-the-vote canvassing and phone bank operations, which the**
20 **Edwards Committee paid for and disclosed in its disclosure reports. CSI further states that its**
21 **contact with the Committee constituted a standard commercial transaction between a campaign**
22 **and a vendor. CSI also subcontracted some of the work to a third-party.**

23 The Committee paid CSI for work, and CSI appears to have operated as a vendor. As a
24 **result, the facts alleged do not state a violation of the Act, and there is no reason to believe that**
25 **CSI violated the Act.**